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October 23, 2019

**By ECF**

Hon. Eric N. Vitaliano  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Andre Adams v. Patrick Quigley, et al.,  
19 CV 1662 (ENV)(RER)

Your Honor:

I am a Senior Counsel in the New York City Law Department, attorney for defendants City of New York, Patrick Quigley, Craig Lupardo, and Daniel Delpino in this action. I write regarding footnote two of Plaintiff's Reply Memorandum in Further Support of Federal Rule of Civil Procedure 72(a) Objection to the Honorable Judge Ramon E. Reyes' September 5, 2019 Order. I apologize for the inadvertency. The correct citation for the case referenced therein is King Cty. v. IKB Deutsche Industriebank AG, 2012 U.S. Dist. LEXIS 116583, \*10-\*11 (S.D.N.Y. 2012).

I apologize for any confusion and thank the Court for its time and consideration herein.

Respectfully submitted,

/s/

*Christopher G. Arko*

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cc: David B. Shanies, Esq. (By ECF)  
*Attorney for Plaintiff*